

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LORETTA I. EURE
Plaintiff,

v.

THE SAGE CORPORATION,
Defendant

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CIVIL ACTION NO.: 5:12-CV-01119-DAE

**DEFENDANT THE SAGE CORPORATION'S RESPONSE TO
PLAINTIFF'S MOTION FOR EXTENSION**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

NOW COMES The Sage Corporation ("Defendant") Defendant in the above entitled and numbered cause, and files this its Response to Plaintiff's Motion to Extend Time to Respond to Defendant's Motion for Summary Judgment. Defendant would respectfully show the Court as follows:

I.

Plaintiff's Counsel first inquired of an extension of time at approximately 10:00 on Monday, August 11. Plaintiff's Counsel indicated he was requesting a thirty (30) day extension of time to respond to the Motion for Summary Judgment and provided no reason for such request. Defendant's Counsel indicated that he would consider the request and would respond before the end of the day. Before waiting for a response from Defendant's Counsel, Plaintiff's Counsel filed a Motion for Extension of Time inaccurately indicating that Defendant has indicated he opposes the Motion without reason. Defendant hereby notifies the Court that

Defendant does not oppose Plaintiff's request for an extension of time for two (2) weeks, which will more than double the normal time provided for such a response.

Respectfully submitted,

NAMAN HOWELL SMITH & LEE, PLLC

BY: /s/ John T. Hawkins

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing Defendant The Sage Corporation's Response to Plaintiff's Motion for Extension has been served by electronic filing on Glenn D. Levy, 906 West Basse Road, Suite 100, San Antonio, Texas 78212 on the 11th day of August, 2013.

/s/ John T. Hawkins
John T. Hawkins